

**INSPECTION SUMMARY REPORT  
PLASTI-CLAD METAL PRODUCTS, INC.**

**Project Number:** R02029

**Project Name:** Non-Notifier Enforcement

**Facility Name:** Plasti-Clad Metal Products, Inc.

**Facility ID #:** NJD011417516

**Facility Address:** 2601 Ridgewood Road  
Wall Township, NJ 07719  
Monmouth County

**Facility Telephone No.:** (908) 449-2665

**Inspector(s):** Alexis Vitone

**Date of Inspection:** 4/29/92

**Arrival/Departure:** 8:40 a.m./4:30 p.m.

**Individual(s) Accompanying  
Inspection Team:**

Mark Matthews, Vice President  
John Luzetsky, Waste Management Engineer

**Regulatory Concerns:**

- NJAC 7:26-9.4(d)4v  
Hazardous waste containers were arranged in a way that identification labels and markings could not be seen.
- CFR 265.35/NJAC 7:26-9.6(e)  
Insufficient aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment.
- CFR 262.34(B)2&3/NJAC 7:26-9.3(a)3  
Hazardous waste containers failed to display period of accumulation; also the words "hazardous waste" did not appear on all hazardous waste containers.

- CFR 262.34(c)1ii/CFR 262.34/NJAC 7:26-9.3(d)(4)  
Hazardous waste containers in satellite accumulation areas failed to display the words "hazardous waste"; accumulation dates not identified on hazardous waste drums.
- CFR 262.34(B)2&3/NJAC 7:26-9.3(b)9  
Aboveground storage tanks (AST) not labeled/marked "hazardous waste".
- CFR 265.16(b)/NJAC 7:26-9.4(g)4  
Individuals dealing with hazardous waste failed to complete a training program within six months of the date of their employment or assignment to the facility.
- CFR 265.16(e)/NJAC 7:26-9.4(g)5  
No annual review of initial training provided.
- CFR 265.16(d)1/NJAC 7:26-9.4(g)6i  
No job title for each position at the facility related to hazardous waste management, and name of employee filling the job.
- CFR 265.16(d)2/NJAC 7:26-9.4(g)6ii  
No job description for each position related to hazardous waste management.
- CFR 265.16(d)3/NJAC 7:26-9.4(g)6iii  
No written description of type and amount of introductory and continuing training that has been given to personnel in jobs related to hazardous waste management.
- CFR 265.16(d)4/NJAC 7:26-9.4(g)6iv  
No documentation of actual training or experience received by personnel.
- CFR 265.16(d)4e/NJAC 7:26-9.4(g)7  
No training records kept on all current employees until closure of the facility and training records kept on former employees for three years from their last date of employment.

#### **Exterior Observations:**

- Weather was sunny and clear; mild winds; low to high 60's.
- Facility is located in an industrial and commercial zone; no residential homes observed within a one-mile radius.
- Lagoon onsite, located on facility grounds, behind main building.
- Wetlands were not observed in the area, however, substantial acreage behind the facility contained trees, weeds, etc., which may be considered a Federal wetland.

## **Operations and Processes:**

This facility has been onsite since 1969. A total of 22 individuals are employed by the company. There is a one-eight hour shift in which all manufacturing processes take place.

Wastes generated include chromium-contaminated soil, which is being cleaned up under NJDEPE and CERCLA enforcement. Other wastes generated are D002, D007, and ID #27 (non-hazardous sludge-waste). D002 and D007 are generated from filtration and cleaning processes. D002 is mostly generated from an ION-SEPT Electrodialysis Unit onsite which removes unwanted ions from chromium, thus allowing the chromic acid to be reused. The D002 is stored in a 6,000 gallon aboveground storage tank (AST), permitted by NJDEPE. According to facility personnel, the tank is rendered empty every 90 days or less.

Operations onsite consist of forming wires, filtration and cleaning processes, and coating processes. The wires are coated with nylon in which dry blended dyes are used to achieve different coloration of nylon coatings.

Finally, other wastes generated are from an exhaust system inside the building over process areas which contains a wet scrubber. This unit is approved and permitted by NJDEPE. Filters from the scrubber are treated as hazardous waste and disposed of by Cycle Chem of New Jersey.

## **Wastes On Site:**

- Four 55-gallon drums containing D007
- One 6,000 gallon tank containing D002 and D007.
- One roll-off (size not noted) containing ID #27 non-hazardous waste sludge from remediation actions onsite.

## **Storage Areas Include:**

<u>Satellite Areas</u>	Located next to process lines - a total of nineteen satellite areas, each area contains one 5-gallon drum. D007 is generated and stored in these containers and then transported to the less than 90-day storage area for hazardous waste drums.
<u>Drum Storage Area</u>	The storage area for hazardous waste consists of one 6,000-gallon AST for D002; hazardous waste drums (total of four 55-gallon drums) for D007 and the ION-SEPT recycling machine. Some staining on the floor was observed around the ION-SEPT equipment. The non-hazardous waste roll-off is stored outside, adjacent to the building and is fenced in.

**Photographs:**

- Storage Areas:
  1. Drums containing hazardous waste
  2. One 6,000 gallon (AST)
  3. Lagoon located onsite
  4. Recycling areas
  5. ION-SEPT unit
  6. Roll-off with ID#27 sludge
  7. ION-SEPT unit area

**Documents Reviewed:**

- Manifests (1990 to present)
- Annual Report to NJDEPE (1991)
- Correspondence regarding closure plan from NJDEPE (dated 12/10/87)
- LDR notification forms
- Training records for Mr. Luzetsky
- Log for AST
- Permit for control equipment
- Reclassification application (dated 4/87)
- Correspondence from NJDEPE regarding TSD status (dated 1/31/89)

**Documents Copied:**

- Random manifests from 1990 to 1992 were copied
- Annual Report to NJDEPE (1991)
- Correspondence regarding closure plan from NJDEPE (dated 12/10/87)
- LDR notification forms
- Training records for Mr. Luzetsky
- Log for AST
- Permit for control equipment
- Reclassification application (dated 4/87)
- Correspondence from NJDEPE regarding TSD status (dated 1/31/89)

**Other:**

Mr. Matthew did not appear to be well organized with the required paperwork needed for this Compliance Evaluation Inspection.

Numerous interruptions occurred throughout the inspection, such as Mr. Matthews stating he had to leave the premises for 1.5 hours and stated I could return later in the day.

On May 5, 1992, Alliance received correspondence from Plasti-Clad regarding hazardous waste, job descriptions, job titles, and employee lists which were requested but were not produced for the inspector at the time of the inspection. In his letter dated May 5, 1992, he stated that all the documents were in fact on site at the time of my inspection, but could not be located. These items are written up as a "Regulatory Concern" because they were not a "readily accessible" at the time of inspection.